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May 9, 2025

VIA ECF

Hon. Valerie Caproni, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 20C
New York, New York 10007

MEMO ENDORSED

Re: Knocking Inc. v. Candi Carter et al. (1:24-cv-09020 (VEC))
Joint Letter Motion for Extension of Time to Serve Status Update to Court

Dear Judge Caproni,

This firm represents plaintiff Knocking Inc. (“Plaintiff” or “Knocking”), in the above-referenced matter. I write today, with consent of all relevant parties, seeking an extension of time for Knocking and defendants Cistus Media, Inc., Candi Carter, and Ana Pitcher (together “Defendants”) to file a letter update to the Court, with regard to the outstanding discovery disputes.

On May 1, 2025, the Court held a discovery conference wherein the parties identified various discovery disputes between the parties. Following the conference, the Court ordered the parties to meet and confer, in-person, for at least two (2) hours to resolve these issues and to provide the Court with an update by today, May 9, 2025. *See* Dkt. No. 56. Pursuant to the order, the parties met on Tuesday, May 6, 2025, for over two (2) hours. During the meeting, the parties amicably resolved many of the issues raised during the conference before the Court. Unfortunately, there are still a few issues that the parties are working to resolve. As such, the parties respectfully request an extension of time to submit the requisite joint letter from May 9, 2025 to May 12, 2025. The parties believe that they can further resolve many issues if granted the additional time.

Thank you for your time and consideration.

Respectfully submitted,

Thomas H. Herndon, Jr., Esq.



THOMAS H. HERNDON, JR. LAW

cc: All Counsel of Record (**VIA EMAIL**)

Application GRANTED. The parties' deadline to submit a joint letter in accordance with the Court's prior Order at Dkt. 56 is ADJOURNED *nunc pro tunc* from Friday, May 9, 2025, to **Monday, May 12, 2025**.

SO ORDERED.

 5/12/2025

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE